

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

<b>WALTER SCOTT LAMB,</b>	)	
	)	
<b>Counterclaim Defendant,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 6:21-cv-55</b>
	)	
<b>LIBERTY UNIVERSITY, INC.,</b>	)	
	)	
<b>Counterclaim Plaintiff.</b>	)	
	)	

**LIBERTY UNIVERSITY, INC.’S MOTION FOR PROTECTIVE ORDER**

Counterclaim Plaintiff Liberty University, Inc. (“Liberty”), by counsel, hereby moves for a protective order seeking an extension of the current discovery deadline of May 9, 2023 and a suspension of all discovery pending the Court’s resolution of Liberty’s pending FRCP 41 Motion for Voluntary Dismissal of its Counterclaim against Counterclaim Defendant Walter Scott Lamb (“Lamb”). In support of its motion, Liberty states as follows:

1. On April 26, 2023, in view of judicial economy and conservation of the Court’s and the parties’ resources, Liberty filed a FRCP 41 Motion for Voluntary Dismissal of its entire Counterclaim against Lamb. (ECF No. 156.)
2. Today the Court issued a briefing schedule on Liberty’s motion, which may run past the current discovery deadline of May 9, 2023.
3. In view of the current discovery deadline of May 9, 2023, Liberty asks for suspension of all discovery pending resolution of Liberty’s pending FRCP 41 Motion, which was designed to conserve the resources of both the Court and parties, and which, if granted, will moot the need for any further discovery in this case.

4. Accordingly, Liberty seeks a protective order extending the current discovery deadline of May 9, 2023 and suspension of all discovery until the Court rules on Liberty's pending FRCP 41 Motion.

Dated: April 26, 2023

Respectfully submitted,

LIBERTY UNIVERSITY, INC.  
BY COUNSEL:

/s/ Scott C. Oostdyk  
Scott C. Oostdyk (VSB No. 28512)  
Heidi E. Siegmund (VSB No. 89569)  
MCGUIREWOODS LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219  
(804) 775-1000  
(804) 775-1061 (facsimile)  
soostdyk@mcguirewoods.com  
hsiegmund@mcguirewoods.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of April, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send a true and correct copy to all counsel of record.

/s/  
Scott C. Oostdyk (VSB No. 28512)  
MCGUIREWOODS LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219  
(804) 775-1000  
(804) 775-1061 (facsimile)  
hsiegmund@mcguirewoods.com